

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (DTS)

Plaintiff,

v.

**DEFENDANTS' DEPOSITION
DESIGNATIONS**

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY,
a Pennsylvania corporation,

Defendants.

Pursuant to the Trial Notice and Final Pretrial Order (ECF No. 923), Defendants Federal Insurance Company and ACE American Insurance Company (collectively, “Defendants”) submit the following Objections and Counter Designations to Plaintiff Fair Isaac Corporation’s Deposition Designations. Defendants have not designated testimony that would be used solely to authenticate documents on their respective exhibit lists. By designating this deposition testimony, Defendants do not concede the admissibility of any evidence if offered by Plaintiff. Additionally, these designations are subject to, and shall not be construed as a waiver of, objections to the admissibility of evidence offered by Plaintiff.

Defendants reserve all other rights with respect to these designations, including the right (i) to supplement with additional designations under the Pretrial Order; (ii) to introduce other deposition testimony for purposes of impeachment, rebuttal, or cross-examination; (iii) to designate additional deposition testimony, or alter these designations;

and (iv) not to offer any portion of the designated deposition testimony at trial. Defendants also object to all designations of attorney objections and colloquy, and designations of “Confidential - Attorneys Eyes Only,” which are unsworn hearsay. Defendants reserve the right to use any deposition testimony designated by Plaintiff.

Objection Keys

CODE	PLAINTIFF’S OBJECTION
A	Authenticity
BE	Best Evidence rule
C	Completeness
CH	Character evidence
H	Hearsay
IE	Improper or unqualified expert testimony
F	Foundation
O	Other
OA	Other acts evidence
P	Probative value outweighed by prejudice/potential for confusion/cumulative
R	Relevance
W	Improperly withheld in discovery
N/A	No objection

CODE	DEFENDANTS' OBJECTION
A	Asked and answered/duplicative
AF	Assumes facts not in evidence
AR	Argumentative
C	Compound
CO	Evidence relating to a compromise offer
EX	Form of expert opinion
H	Hearsay
IH	Improper hypothetical
L	Leading
LC	Calls for a legal conclusion
LF	Lacks foundation
M	Mischaracterizes testimony
MD	Mischaracterizes document
N	Non-responsive
NA	Calls for narrative
O	Inadmissible opinion or conclusion
P	Probative value outweighed by prejudice/potential for confusion/cumulative
PK	No personal knowledge
PR	Privilege
R	Relevance
S	Calls for speculation
Scope	Outside the scope of affirmative designation
V	Vague and ambiguous
W	Other crimes, wrongs, or acts

Oliver Clark

Defendants' Deposition Designations – Oliver Clark (September 11, 2018)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter- Counter Designations
Page 13, lines 15-25	N/A			
Page 14, lines 1-17	N/A			
Page 50, lines 2-11	R, H			
Page 51, lines 2-13	R, H, F			
Page 51, lines 17-20	R, H			
Page 52, lines 2-23	R, H			
Page 53, lines 1-11	R			
Page 53, line 25	R, H, F			
Page 54, lines 1-4	R, H, F			
Page 54, lines 9-25	R, H, F			
Page 55, lines 1-17	R, H, F			
Page 60, lines 18-22	R, H, F			
Page 61, lines 3-9	R			
Page 63, lines 10-17	R			
Page 67, lines 4-6	R, H, F			
Page 67, lines 8-9	R, H, F			
Page 69, lines 2-5	R			
Page 69, lines 11-22	R			
Page 69, lines 24-25	R			
Page 70, lines 1-4	R			
Page 77, lines 11-20	R			
Page 78, lines 1-12	R, H, F			
Page 78, lines 14-25	R, H, F			
Page 79, lines 1-5	R, H, F			
Page 79, lines 14-18	R, H, F			
Page 79, lines 20-21	R, H, F			
Page 84, lines 24-25	R			
Page 85, lines 1-25	R, H, F			
Page 86, lines 1-10	R, H, F			
Page 86, lines 12-16	R, H, F			
Page 86, lines 18-25	R, H, F			
Page 87, lines 3-14	R, H, F			
Page 87, lines 19-25	R, H, F			
Page 88, lines 1-6	R, H, F			

Defendants’ Deposition Designations – Oliver Clark (September 11, 2018)	Plaintiff’s Objections	Plaintiff’s Counter Designations	Defendants’ Objections	Defendants’ Counter- Counter Designations
Page 89, lines 15-25	R, H, F			
Page 90, lines 1-14	R, H, F			
Page 91, lines 1-10	R			
Page 91, lines 14-25	R			
Page 92, lines 1-11	R			
Page 93, lines 21-25	R, H			
Page 94, lines 1-25	R, H, F			
Page 95, lines 1-25	R, H, F			
Page 96, lines 1-25	R, H, F			
Page 97, lines 1-25	R, H, F			
Page 98, lines 3-20	R, H, F			
Page 98, lines 23-25	R, H, F			
Page 99, lines 1-5	R, H, F			
Page 100, lines 8-25	R, H			
Page 101, lines 1-16	R, H, F	101:21-25 102:1-3		
Page 102, lines 22-25	R			
Page 103, lines 1-9	R			
Page 103, lines 12-25	R, H, F			
Page 104, line 1	R, H, F			
Page 104, lines 3-22	R, H, F			
Page 105, lines 3-25	R, H, F			
Page 106, lines 1-14	R, H			
Page 106, lines 17-25	R, H			
Page 107, lines 1-25	R, H, F			
Page 108, lines 1-2	R, H, F			
Page 108, lines 15-25	R, H, F			
Page 109, lines 1-19	R, H, F			
Page 110, lines 8-25	R, H, F			
Page 111, lines 1-25	R, H, F			
Page 112, lines 1-25	R, H, F			
Page 113, lines 1-25	R, H, F			
Page 114, lines 1-25	R, H, F	116:24-25 117:1-12		
Page 115, lines 1-4	R			
Page 115, line 6	R			

Defendants’ Deposition Designations – Oliver Clark (September 11, 2018)	Plaintiff’s Objections	Plaintiff’s Counter Designations	Defendants’ Objections	Defendants’ Counter- Counter Designations
Page 117, line 25	R			
Page 118, lines 1-7	R			
Page 118, lines 14-25	R			
Page 119, lines 1-25	R, H			
Page 121, lines 7-9	R			
Page 121, lines 24-25	R, H, F			
Page 122, lines 1-10	R, H, F			
Page 123, lines 3-25	R, H			
Page 124, lines 1-25	R, H, F			
Page 125, lines 1-2	R, H			
Page 125, lines 10-25	R			
Page 126, lines 1-25	R			
Page 127, lines 1-15	R			
Page 128, lines 17-25	R, H			
Page 129, lines 1-11	R, H			
Page 130, lines 1-25	R, H, F			
Page 131, lines 1-16	R, H, F			
Page 131, lines 22-25	R, H, F			
Page 132, lines 1-6	R, H, F			
Page 133, lines 4-7	R			
Page 133, lines 20-25	R, H, F			
Page 134, lines 1-9	R, H, F			
Page 134, lines 23-25	R			
Page 135, lines 5-15	R, H, F			
Page 135, line 25	R, H, F			
Page 136, lines 1-3	R, H, F			
Page 136, lines 7-13	R, H, F			
Page 136, lines 14-22	N/A			
Page 136, line 24	N/A			
Page 137, lines 1-25	R, H, F			
Page 138, lines 1-14	R, H, F			
Page 146, lines 11-25	R			
Page 147, lines 1-25	R			
Page 148, lines 1-25	R, H, F			
Page 148, lines 1-5	R, H, F			

Defendants’ Deposition Designations – Oliver Clark (September 11, 2018)	Plaintiff’s Objections	Plaintiff’s Counter Designations	Defendants’ Objections	Defendants’ Counter- Counter Designations
Page 155, lines 13-25	R, H, F			
Page 156, lines 1-3	R, H, F			
Page 156, lines 12-25	R, H, F			
Page 157, lines 1-25	R			
Page 158, lines 1-10	R			
Page 160, lines 1-9	R, H, F			
Page 161, lines 6-10	R			
Page 165, lines 14-15	R			
Page 165, lines 19-25	R, H			
Page 166, lines 1-6	R			
Page 167, lines 20-25	R, H, F			
Page 168, lines 1-25	R, H, F			
Page 169, lines 1-3	R, H, F			
Page 170, lines 6-25	R, H, F			
Page 171, lines 1-5	R, H, F			
Page 171, lines 7-24	R, H, F			
Page 172, lines 2-5	R, H, F			
Page 172, lines 11-13	R, H, F			
Page 172, lines 16-25	R, H, F			
Page 173, lines 1-16	R, H, F			
Page 174, lines 8-25	R, H, F			
Page 175, lines 1-5	R, H, F			
Page 175, lines 14-25	R, H, F			
Page 176, lines 1-9	R, H, F			
Page 177, lines 22-25	R, H, F			
Page 178, lines 1-5	R, H, F			
Page 178, lines 7-13	R, H, F			
Page 178, lines 16-19	R, H, F			
Page 178, lines 22-25	R, H, F			
Page 179, lines 1-17	R, H, F			
Page 180, lines 1-13	R, H			
Page 182, lines 22-25	R			
Page 183, lines 1-25	R, H, F			
Page 184, lines 1-5	R, H, F			
Page 184, lines 8-9	R, H, F			
Page 185, lines 3-6	R			

Defendants’ Deposition Designations – Oliver Clark (September 11, 2018)	Plaintiff’s Objections	Plaintiff’s Counter Designations	Defendants’ Objections	Defendants’ Counter- Counter Designations
Page 185, lines 13-20	R, H, F			
Page 185, lines 22-24	R, H, F			
Page 187, lines 9-11	R			
Page 187, lines 20-25	R, F			
Page 188, lines 1-12	R, F			
Page 188, lines 16-25	R, F			
Page 189, lines 1-9	R, F			
Page 189, lines 13-25	R, H, F			
Page 192, lines 11-15	R			
Page 193, lines 17-25	R, F			
Page 194, line 1	R, F			
Page 194, lines 5-25	R, H, F			
Page 195, lines 1-8	R, H, F			
Page 195, lines 15-17	R, H			
Page 199, lines 10-11	R, F			
Page 199, line 13	R, F			
Page 209, lines 11-25	N/A			
Page 210, lines 9-14	N/A			
Page 210, lines 19-20	N/A			

Henry Mirollyuz, July 31, 2018

Defendants' Deposition Designations – Henry Mirollyuz (July 31, 2018)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter- Counter Designations
Page 7, lines 13-24	N/A			
Page 13, lines 5-25	N/A			
Page 14, lines 1-7	N/A			
Page 15, lines 9-22	N/A			

Henry Mirolyuz, January 11, 2019

Defendants' Deposition Designations – Henry Mirolyuz (January 11, 2019)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 12, lines 17-25	N/A			
Page 13, lines 1-6	N/A			
Page 30, lines 19-21	H, F, R, P			
Page 30, line 25	H, F, R, P			
Page 31, lines 1-25	H, F, R, P			
Page 32, lines 1-20	H, F, R, P			
Page 64, lines 13-25	N/A			
Page 65, lines 1-8	N/A			
Page 65, lines 11-25	H, F			
Page 66, lines 1-11	H,F			
Page 73, lines 23-25	N/A			
Page 74, lines 1-4	N/A			
Page 74, lines 7-9	N/A			
Page 83, lines 14-25	F			
Page 84, lines 1-25	F			
Page 85, lines 1-2	F			
Page 133, lines 11-25	N/A			
Page 134, lines 1-8	N/A			
Page 157, lines 15-25	F			
Page 158, lines 1-25	F			
Page 159, lines 1-8	F			

Michael Sawyer

Defendants' Deposition Designations – Michael Sawyer (October 2, 2018)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 6, lines 7-14	N/A			
Page 7, lines 7-13	N/A			
Page 8, lines 15-18	N/A			
Page 9, lines 4-17	N/A			
Page 10, lines 8-24	N/A			
Page 11, lines 1-9	N/A			
Page 12, lines 7-11	N/A			
Page 12, lines 22-24	N/A			
Page 13, lines 1-24	N/A			
Page 14, lines 1-24	N/A			
Page 15, lines 1-24	N/A			
Page 16, lines 1-6	N/A	16:7-10; 16:13-19	H, LF, P, PK, R	17:17-18:7
Page 18, lines 12-24	N/A			
Page 19, lines 1-11	N/A			
Page 19, lines 13-24	N/A			
Page 20, lines 1-24	N/A			
Page 21, lines 1-24	N/A			
Page 22, lines 1-12	N/A			
Page 22, lines 17-24	N/A			
Page 23, lines 1-22	N/A			
Page 24, lines 3-24	N/A			
Page 25, lines 1-24	N/A			
Page 26, lines 1-24	N/A			
Page 27, lines 1-14	N/A			
Page 27, lines 18-24	R (lines 11-24)			
Page 28, lines 1-4	R			
Page 28, lines 14-24	R			
Page 29, lines 1-22	R			
Page 29, line 24	N/A			
Page 30, lines 1-7	N/A			
Page 31, lines 3-9	N/A			
Page 32, lines 9-20	S, F			
Page 33, lines 19-24	N/A			

Defendants' Deposition Designations – Michael Sawyer (October 2, 2018)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 34, lines 1-16	C	34:17-24	H, P, PK, R	
Page 35, lines 8-24	C	35:1-7	H, P, PK, R	
Page 36, lines 1-24	N/A			
Page 37, lines 1-6	N/A			
Page 37, lines 13-24	C	37:7-12	H	
Page 38, lines 6-24	C	38:1-5	H	
Page 39, lines 1-5	N/A			
Page 39, lines 9-24	R, S			
Page 40, lines 1-24	N/A			
Page 41, lines 1-21	N/A			
Page 50, lines 13-24	R, C	49:14-50:12	H, LF, P, PK, R	
Page 51, lines 1-24	R			
Page 52, lines 1-4	R, C	52:5-24	H, LF, P, PK, R	53:1-5
Page 53, lines 6-11	R			
Page 53, line 24	N/A			
Page 54, lines 1-24	N/A			
Page 55, line 1	C	59:11-24; 60:1-2	H, P, PK, R, Scope	
Page 75, lines 6-24	F			
Page 76, lines 1-8	H, R			
Page 76, lines 12-24	H, R			
Page 77, lines 1-24	H, R			
Page 78, lines 1-24	H, R			
Page 80, lines 7-24	R			
Page 81, lines 13-24	R			
Page 82, lines 1-24	R			
Page 83, lines 1-24	R			
Page 84, lines 1-4	N/A			
Page 85, lines 18-24	N/A			
Page 86, lines 1-24	N/A			
Page 87, lines 1-24	C			
Page 88, line 1	C	91:20-24; 92:1-15	H, P, PK, R, Scope	92:16-18; 92:21-93:2
Page 100, lines 20-24	R			

Defendants' Deposition Designations – Michael Sawyer (October 2, 2018)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 101, lines 1-19	R, F, S			
Page 101, lines 21-24	N/A			
Page 102, lines 1-2	C	102:3-6		
Page 102, lines 7-9	C	102:10-18		
Page 102, lines 19-24	S			
Page 103, lines 1-5	N/A			
Page 110, lines 9-24	N/A			
Page 111, lines 1-24	C	112:1-22	H, LF, R, P, PK	
Page 112, lines 23-24	C	112:1-22	H, LF, R, P, PK	
Page 113, lines 1-6	C	113:1-24; 114:1-4; 114:7–24; 115:1-4; 115:13-19	H, LF, P, PK, R	
Page 115, lines 20-24	N/A			
Page 116, lines 1-16	N/A			
Page 116, lines 23-24	N/A			
Page 117, lines 1-24	N/A			
Page 118, lines 1-24	N/A			
Page 119, lines 1-24	P, O (legal conclusion), S, F			
Page 120, lines 1-24	P, O (legal conclusion), S, F			
Page 121, lines 1-6	F, S			
Page 121, lines 10-18	P, O (legal conclusion), S, F			
Page 129, lines 9-24	N/A			
Page 130, lines 1-16	N/A			

Defendants' Deposition Designations – Michael Sawyer (October 2, 2018)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 134, lines 18-24	C	133:18-24; 134:1-17	H, LF, PK, P, R	
Page 135, lines 1-6	C	135:7-12	H, LF, PK, P, R	
Page 141, lines 8-17	R, P			
Page 145, lines 13-24	R, P			
Page 146, lines 1-24	R, P			
Page 148, line 24	N/A			
Page 149, lines 1-24	N/A			
Page 150, lines 1-14	N/A			
Page 151, lines 13-24	N/A			
Page 152, lines 1-11	N/A			
Page 153, lines 21-24	N/A			
Page 154, lines 1-6	N/A			
Page 180, lines 23-24	N/A			
Page 181, lines 1-7	N/A			
Page 181, lines 10-24	N/A			
Page 182, lines 1-16	N/A			
Page 197, lines 5-14	N/A			
Page 197, lines 17-24	N/A			
Page 198, lines 1-7	N/A			
Page 199, lines 18-24	N/A			
Page 200, line 1	N/A			

Russell Schreiber

Defendants' Deposition Designations – Russell Schreiber (October 24, 2018)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 5, lines 11-12	N/A			
Page 7, lines 8-12	N/A			
Page 8, lines 6-25	N/A			
Page 9, lines 2-25	N/A			
Page 10, lines 2-25	N/A			
Page 11, lines 2-25	N/A			
Page 14, lines 23-25	N/A			
Page 15, lines 2-25	N/A			
Page 16, line 2	N/A			
Page 16, lines 20-25	N/A			
Page 17, lines 2-25	N/A			
Page 18, lines 2-25	N/A			
Page 19, line 2	N/A			
Page 20, lines 12-25	N/A			
Page 21, lines 2-25	N/A			
Page 22, lines 2-4	N/A			
Page 22, lines 7-8	N/A			
Page 29, lines 5-25	N/A			
Page 30, lines 2-25	N/A			
Page 31, lines 2-25	N/A			
Page 32, lines 2-25	N/A			
Page 33, lines 2-25	N/A			
Page 34, lines 2-11	N/A	34:12-35:4 35:5-36:5	LF, N, O, LC, R, V LF, LC, O, P, R, V 35:1 – H 36:1 – H	
Page 38, lines 11-25	R			
Page 39, lines 2-4	F, R	39:5-18	39:10-18 – N, P, R	
Page 40, lines 5-10	F, R	40:11-41:24	40:17-24 – N, P, R	

Defendants' Deposition Designations – Russell Schreiber (October 24, 2018)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
			41:9-16 – N, P, R, LF, LC, O 41:17-24 – LC, O	
Page 41, line 25	N/A			
Page 42, lines 2-21	N/A			
Page 44, lines 13-25	N/A			
Page 45, lines 2-21	N/A			
Page 50, lines 19-25	N/A			
Page 51, lines 2-25	N/A			
Page 52, lines 2-25	R			
Page 53, lines 2-25	R			
Page 54, lines 2-6	R			
Page 57, lines 20-25	F, R			
Page 58, lines 2-7	F, R			
Page 62, lines 22-25	N/A			
Page 63, lines 2-3	N/A			
Page 63, lines 24-25	F, R			
Page 64, lines 2-25	F, R			
Page 65, lines 2-15	F, R	65:16-25		
Page 66, lines 2-8	R			
Page 67, lines 15-25	N/A			
Page 68, lines 2-25	N/A			
Page 69, lines 2-7	N/A			
Page 70, lines 4-25	N/A			
Page 71, lines 2-20	N/A			
Page 72, lines 5-10	N/A			
Page 73, lines 8-14	N/A			
Page 86, lines 2-12	N/A			
Page 95, lines 23-25	N/A			
Page 96, lines 2-25	N/A			
Page 97, lines 2-9	N/A	97:10-12		
Page 97, lines 13-25	F, R			
Page 98, lines 4-8	F, R			
Page 98, lines 24-25	F, R			

Defendants' Deposition Designations – Russell Schreiber (October 24, 2018)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 103, lines 22-25	R	102:11-103:3	102:16-18 N, P, R 102:23-103:3 – N, P, R	
Page 104, lines 2-21	F, R	104:22-105:10	105:2-10 – A, N, P 105:1 – H	105:16-20; 106:4-6; 107:3-15
Page 123, lines 21-25	N/A			
Page 124, lines 2-18	N/A			
Page 149, lines 4-24	F, R			
Page 151, lines 13-21	F, R	151:22-152:5	N, P, R 152:1 – H	
Page 152, lines 6-13	F, R			
Page 152, lines 20-25	R			
Page 153, lines 2-25	F, R			
Page 154, lines 2-18	F, R	154:19-155:4 155:5-16 155:17-22	N, P, R 155:1 – H N, P, LC, O, LF LC, O, LF	156:8-19
Page 156, lines 20-25	F, R			
Page 157, lines 2-25	R			
Page 158, lines 2-7	F, R			
Page 158, lines 17-25	F, R			
Page 159, line 2	F, R			
Page 168, lines 21-22	R			
Page 169, lines 21-25	F, R			
Page 170, line 2	F, R			
Page 171, lines 2-6	F, R			

Defendants' Deposition Designations – Russell Schreiber (October 24, 2018)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 172, lines 8-25	R			
Page 173, lines 2-25	F, R			
Page 174, lines 2-8	F, R	174:9-23	N, P, R	176:23-25; 177:2; 177:4; 177:7-10
Page 176, lines 3-22	R	177:11-21		178:8-20
Page 180, lines 23-25	R			
Page 181, lines 2-20	R			
Page 182, lines 11-19	R	182:3-10	N, P, R	
Page 203, lines 23-25	R			
Page 204, lines 2-8	R	204:9-11		
Page 204, lines 19-25	R			
Page 205, lines 2-25	R			
Page 206, lines 2-25	R			
Page 207, lines 2-25	R			
Page 208, lines 2-5	R			
Page 209, lines 18-19	R			
Page 209, line 25	R			
Page 210, lines 2-25	R			
Page 211, lines 2-25	R			
Page 212, lines 2-25	R			
Page 213, lines 2-25	R			
Page 214, lines 2-13	R	214:14-18		
Page 215, lines 18-25	R	216:1-7	216:1 – H	216:8-11; 216:14-15
Page 217, lines 19-23	R	217:6-18; 217:24-219:2	N, P, R N, P, R, S, 218:1 – H 219:1 – H	

Defendants' Deposition Designations – Russell Schreiber (October 24, 2018)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 219, lines 15-25	R	221:3-8; 223:15-19; 224:14-225:17	H, R Scope Scope 225:1 – H	226:5-6; 226:8-12; 226:25; 227:2-11; 228:2-8
Page 220, lines 2-18	R			
Page 234, lines 14-22	N/A			
Page 236, lines 23-25	N/A			
Page 237, lines 2-14	N/A			
Page 241, lines 22-25	N/A			
Page 242, lines 6-25	R, P			
Page 243, lines 2-25	N/A			
Page 244, lines 2-3	N/A			
Page 248, lines 22-25	N/A			
Page 249, lines 2-16	N/A			
Page 251, lines 6-25	N/A			
Page 252, lines 2-15	N/A			
Page 255, lines 5-16	N/A	255:17-256:4	255:17-23 – H 256:1 – H	
Page 256, lines 5-25	N/A			
Page 257, lines 2-16	N/A	257:17-258:2	258:1 – H	
Page 265, lines 10-15	N/A			
Page 266, lines 8-25	N/A			
Page 267, lines 2-10	N/A			
Page 272, lines 2-25	N/A			
Page 273, lines 2-25	N/A			
Page 274, lines 2-25	R			
Page 275, lines 2-3	R			
Page 275, lines 8-12	R			
Page 275, lines 20-25	N/A	275:4-7	H, R	

Defendants’ Deposition Designations – Russell Schreiber (October 24, 2018)	Plaintiff’s Objections	Plaintiff’s Counter Designations	Defendants’ Objections	Defendants’ Counter- Counter Designations
Page 276, lines 2-25	N/A			
Page 277, lines 2-5	N/A			
Page 280, lines 23-25	N/A			
Page 281, lines 2-4	N/A			
Page 283, lines 9-25	N/A	282:23-283:8	282:23-283:5 – LF, P, R 283:1 – H	282:14-20
Page 284, lines 2-3	N/A			
Page 285, lines 4-23	N/A			
Page 286, lines 11-25	N/A			
Page 287, lines 2-25	N/A			
Page 288, lines 2-25	N/A			
Page 289, lines 2-25	N/A			
Page 290, lines 2-25	N/A			
Page 291, lines 2-23	N/A			
Page 292, lines 2-3	N/A			
Page 302, lines 9-15	N/A			
Page 303, lines 2-10	N/A			
Page 303, lines 13-15	N/A			
Page 303, line 18	N/A			
Page 346, lines 21-23	R			
Page 347, lines 10-22	R			
Page 347, lines 24-25	R			

Lawrence Wachs

Defendants' Deposition Designations – Lawrence Wachs (February 26, 2019)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 5, lines 18-20	N/A			
Page 6, lines 6-8	N/A			
Page 7, lines 13-20	N/A			
Page 7, lines 23-25	N/A			
Page 8, lines 1-18	N/A			
Page 8, lines 24-25	N/A			
Page 9, lines 1-22	N/A			
Page 13, lines 1-25	N/A			
Page 14, lines 1-7	N/A			
Page 14, lines 15-22	N/A			
Page 17, lines 14-25	N/A			
Page 18, lines 1-25	N/A			
Page 19, lines 1-2	N/A	19:3-12	R	
Page 19, lines 13-25	O (Work Product)			
Page 20, lines 1-21	N/A			
Page 21, lines 17-20	O (Work Product)			
Page 28, lines 21-25	N/A			
Page 29, lines 1-25	N/A			
Page 30, lines 1-25	N/A			
Page 31, lines 1-25	N/A			
Page 32, lines 1-25	N/A			
Page 33, lines 1-25	N/A			
Page 34, lines 1-16	N/A	34:17-24	LF, PK	
Page 34, line 25	N/A			
Page 35, lines 1-25	N/A			
Page 36, lines 1-16	N/A	36:17-37:5		
Page 38, lines 14-25	N/A	38:3-5		
Page 39, lines 1-25	N/A			
Page 40, lines 1-25	N/A			
Page 41, lines 1-22	N/A	44:3-19; 47:12-49:22	H 49:17-22 – LC, LF, O	44:23-45:2; 45:6-19; 50:19- 51:23
Page 59, lines 7-25	N/A	58:17-59:6		

Defendants' Deposition Designations – Lawrence Wachs (February 26, 2019)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 60, lines 1-4	N/A			
Page 60, lines 7-15	N/A	60:16; 60:23-61:4	N, R, S	
Page 61, lines 5-23	N/A			
Page 62, lines 4-12	N/A			
Page 62, lines 17-25	N/A			
Page 63, lines 1-3	N/A			
Page 67, lines 4-12	N/A			
Page 67, lines 15-16	N/A			
Page 67, lines 19-25	N/A			
Page 68, lines 1-7	N/A			
Page 71, lines 13-25	N/A			
Page 72, lines 1-20	N/A			
Page 74, lines 6-25	N/A			
Page 75, lines 1-25	N/A			
Page 76, lines 1-25	N/A			
Page 77, lines 1-25	N/A			
Page 78, lines 1-12	N/A			
Page 80, lines 16-25	N/A			
Page 81, lines 1-3	N/A			
Page 81, lines 5-14	N/A			
Page 82, lines 11-25	N/A			
Page 83, lines 1-11	N/A			
Page 84, lines 21-25	N/A			
Page 85, lines 1-6	N/A			
Page 87, lines 1-25	N/A			
Page 88, lines 1-12	N/A			
Page 88, lines 15-25	N/A			
Page 89, lines 1-24	N/A			
Page 92, lines 6-25	N/A	91:18-92:5	91:23-92:5 – EX, LC, LF, O	
Page 93, lines 1-10	N/A			
Page 94, lines 10-20	R			
Page 94, line 25	R			
Page 95, lines 1-24	R			
Page 96, lines 11-13	R			

Defendants' Deposition Designations – Lawrence Wachs (February 26, 2019)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 96, lines 16-25	R			
Page 97, lines 1-7	R	97:18-98:20	H	
Page 98, lines 21-25	N/A			
Page 99, lines 1-16	N/A			
Page 99, lines 19-23	N/A	99:24-100:6		
Page 103, lines 20-25	N/A			
Page 104, lines 1-25	N/A			
Page 105, lines 1-25	N/A			
Page 106, lines 1-3	N/A	106:4-7		
Page 106, lines 8-10	N/A			
Page 106, lines 23-25	N/A			
Page 107, lines 1-12	N/A			
Page 107, lines 19-25	N/A			
Page 108, lines 1-18	N/A	108:19-109:16; 109:25-112:25	Scope Scope	109:17-24
Page 113, lines 1-25	R			
Page 114, lines 1-8	R			
Page 114, lines 18-25	N/A			
Page 115, lines 1-6	N/A			
Page 132, lines 16-19	R	132:20-133:7		
Page 133, lines 8-25	F, R			
Page 134, lines 1-25	F, R			
Page 135, lines 13-25	R			
Page 136, lines 1-25	R			
Page 137, lines 1-3	R	137:4-9	R	
Page 137, lines 10-25	R	138:4-10	H, MD, S	138:11-20
Page 138, lines 1-3	R			
Page 139, lines 9-14	R	139:15-140:9	H, O, PK	
Page 140, lines 10-11	R			

Defendants' Deposition Designations – Lawrence Wachs (February 26, 2019)	Plaintiff's Objections	Plaintiff's Counter Designations	Defendants' Objections	Defendants' Counter-Counter Designations
Page 140, lines 21-25	R			
Page 141, lines 1-25	R			
Page 142, lines 7-25	R	142:1-6	MD	
Page 143, lines 1-11	R			
Page 146, lines 7-25	R			
Page 147, lines 1-9	R			
Page 147, lines 12-21	R			
Page 148, lines 12-25	R			
Page 149, lines 1-3	R			
Page 150, lines 10-17	N/A			
Page 154, lines 20-25	N/A			
Page 155, lines 1-6	N/A	155:7-13; 158:5-24		158:25-159:19
Page 170, lines 24-25	R			
Page 171, lines 1-8	R			
Page 171, lines 19-25	R			
Page 172, lines 1-13	R	172:14-173:18	LC, LF, MD, O, PK, S	173:19-25
Page 175, lines 17-25	R	174:23-175:16	AF, LF, MD, O, PK, S	
Page 176, lines 1-14	R			

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